

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

DIANE ERDMANN,

Debtor.

No. 19-41238

EX PARTE APPLICATION FOR
EMPLOYMENT OF COUNSEL FOR
TRUSTEE

COMES NOW Kathryn A. Ellis, the duly appointed Chapter 7 Trustee for the above-captioned bankruptcy estate ("Trustee"), and for her *Ex Parte* Application for Appointment of Counsel for Trustee, states as follows:

1. The Trustee believes that her interests and the estate's interests can best be represented by retaining legal counsel. Specifically, legal counsel will be of assistance regarding the investigation and litigation of avoidance claims and the debtor's interest in assets held by Mark Calvert, Trustee of the bankruptcy estate of Northwest Territorial Mint LLC (Bk. No. 16-11767). Given the fact that there are no funds in the estate currently to pay counsel, outside counsel does not appear feasible. Further, given my knowledge of the essential facts in this case, it would appear economical.

2. The Trustee wishes to retain herself as counsel in this proceeding, at the regular hourly rate of \$425.00 per hour. No retainer has been promised or provided.

3. Based upon of the Declaration of Disinterest submitted herewith, the Trustee is aware of no connections between herself and the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the

***EX PARTE* APPLICATION FOR
APPOINTMENT OF COUNSEL FOR TRUSTEE - 1**

KATHRYN A. ELLIS PLLC
5506 6th Ave S
Suite 207
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1 office of the United States Trustee other than as set forth above.

2 WHEREFORE, the Trustee requests that the Court enter an *ex parte* order authorizing
3 Kathryn A. Ellis to represent the Trustee and her interests in any and all legal matters that may
4 arise during the administration of this case.
5

6 No notice to creditors of this application is necessary pursuant to 11 U.S.C. § 102 (1) and
7 FRBP 2002.

8 WHEREFORE, the Trustee prays for an order accordingly.

9 DATED this 16th day of July, 2019.
10

11 /s/ Kathryn A. Ellis
12 Kathryn A. Ellis, Trustee

13 The undersigned declares under the penalty of perjury that he provided the Office of the
14 United States Trustee with a copy of this Application, Declaration of Disinterest and
15 proposed order pursuant to LBR 2014-1 (b) and has received authorization from the
16 Office of the United States Trustee to file the same.

17 DATED this 17th day of July, 2019 at Seattle, Washington.

18 /s/ Christopher Williams
19 Christopher Williams
Assistant to Kathryn A. Ellis

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